



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

962438

REPLY TO THE ATTENTION OF:

C-14J

November 2, 2009

Joseph D. Lonardo
Vorys, Sater, Seymour and Pease LLP
52 East Gay Street
PO Box 1008
Columbus, Ohio, 43215

RE: Trinity Superfund Site (Cleveland, Ohio)
Oversight Bill dated October 8, 2009

Dear Mr. Lonardo:

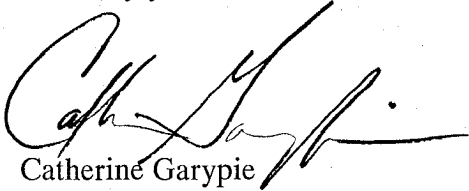
Thank you for your letter dated November 2, 2009. As you know, the Administrative Order on Consent ("AOC") which the United States Environmental Protection Agency ("U.S. EPA") issued to the Standex International Corporation states in paragraph 36.a. that "[o]n a periodic basis, U.S. EPA will send [Standex] a bill requiring payment that consists of an Itemized Cost Summary." Further, "[Standex] shall make all payments within 30 calendar days of receipt of each bill requiring payment." U.S. EPA issued a bill on October 8, which attached an Itemized Cost Summary. Your letter dated November 2, 2009, requests an extension to the due date for the bill as well as additional information regarding the costs billed.

Unfortunately, U.S. EPA cannot extend the due date for the bill without amending the AOC. U.S. EPA does not believe it is appropriate to amend the AOC at this time. Another option is for Standex to invoke the dispute resolution provisions of Section XVI. of the AOC and follow the directions in paragraph 38. for the payment of contested and uncontested costs. Please advise U.S. EPA immediately if Standex is invoking dispute resolution.

Turning to the additional information requested, U.S. EPA may be able to provide some of the information you request, although please be advised that U.S. EPA does not typically provide a full cost documentation package for an oversight bill where an Itemized Cost Summary is provided pursuant to the terms of a settlement agreement.

I propose that we have a telephone conversation to discuss this matter further. Please contact me at (312) 886-5825. Note that I will be out of the office on Thursday and Friday this week.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Cathy Garypie', with a stylized flourish at the end.

Catherine Garypie
Associate Regional Counsel

cc: Stacey S. Conostas, Esq.
Standex International Corporation
6 Manor Parkway
Salem, New Hampshire 03079

bcc: H. Croke, ORC
J. Fredle, SFD